

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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ROBERT GUTIERREZ ROSARIO,
*individually and on behalf of others similarly
situated,*

Plaintiff,

-against-

ERNIE'S AUTO DETAILING INC. (D/B/A
ERNIE'S AUTO DETAILING INC.),
ERNESTO DECENA, ROMAN DOE,
JERRY DOE, LEO DOE, KELVIN DOE,
and LEO DOE,

Defendants.

Civ. No.: 20-cv-03762
(PKC)(SJB)

**STIPULATION EXTENDING DEFENDANTS ERNIE'S AUTO
DETAILING INC. AND ERNESTO DECENA'S TIME TO ANSWER,
MOVE OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

It hereby is STIPULATED AND AGREED, by and between Plaintiff and Defendants Ernie's Auto Detailing Inc. and Ernesto Decena ("Defendants"), through their undersigned attorneys, who are authorized to enter into this Stipulation, that any obligation on the part of Defendants to answer, move, or otherwise respond to the Complaint in this matter is extended to and including December 16, 2020;

It is FURTHER STIPULATED AND AGREED, by and between Plaintiff and Defendants, through their undersigned attorneys, who are authorized to enter this Stipulation, that no previous requests for extension of the current putative deadline for Defendants to respond of November 16, 2020 have been made;

It is FURTHER STIPULATED AND AGREED, by and between Plaintiff and Defendants, through their undersigned attorneys, who are authorized to enter this Stipulation,

that Defendants hereby waive any defenses based on alleged defects in service of process, and expressly reserve all other defenses.

MICHAEL FAILLACE & ASSOCIATES
ATTORNEYS FOR PLAINTIFF
60 East 42nd Street, Ste. 4510
New York, New York 10165
(212) 317-1200

By: 
CLELA A. ERRINGTON, ESQ.

Dated: 11/20/2020

JACKSON LEWIS P.C.
ATTORNEYS FOR DEFENDANTS
58 South Service Rd., Ste. 250
Melville, New York 11747
(631) 247-0404

By: s/ Jaime Sanchez
NOEL P. TRIPP, ESQ.
JAIME SANCHEZ, ESQ.

Dated: 11/22/2020

SO ORDERED on this ____ day of November, 2020

United States District Judge

4841-4473-1858, v. 1